

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ERIC FORSYTHE, Individually and On Behalf of All Others Similarly Situated,	:	
	:	
	:	
Plaintiff,	:	C.A. No. 04-CV-10584 (GAO)
	:	
vs.	:	
	:	
SUN LIFE FINANCIAL INC., et als.,	:	
	:	
Defendants,	:	

MOTION TO ADMIT PRO HAC VICE

Now comes Nancy Freeman Gans, a member in good standing of the bar of this Court, and moves the admission in the above-entitled cause of action Robert S. Gans, Esquire, of Bernstein Litowitz Berger & Grossmann LLP, of San Diego, California, and James E. Tullman, Esquire, of Weiss & Yourman, of New York, New York. Attorneys Gans and Tullman each certifies (see Certificates attached to this motion as Exhibit A) that (1) he is a member of the bar in good standing in all jurisdictions where he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I have filed an appearance in the above-entitled action.

DATED: September 20, 2004

Respectfully submitted,

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail (by hand) on 9/20/04

[Signature]

MOULTON & GANS, P.C.

By: *Nancy Freeman Gans*
Nancy Freeman Gans (BBO #184540)
33 Broad Street, Suite 1100
Boston, Massachusetts 02109-4216
(617) 369-7979

Plaintiffs' Counsel


EXHIBIT A

**CERTIFICATION FOR ADMISSION PRO HAC VICE PURSUANT TO
LOCAL RULE 83.5.3 OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts, I, Robert S. Gans, hereby certify that:

1. I am a member in good standing of the bars of the States of New York and California.
2. There are no disciplinary proceedings pending against me as a member of the foregoing bars; and
3. I have read and am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: 
Robert S. Gans
12544 High Bluff Drive
Suite 150
San Diego, CA 92103

Dated: September 20, 2004

**CERTIFICATION FOR ADMISSION PRO HAC VICE PURSUANT TO
LOCAL RULE 83.5.3 OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts, I, James E. Tullman, hereby certify that:

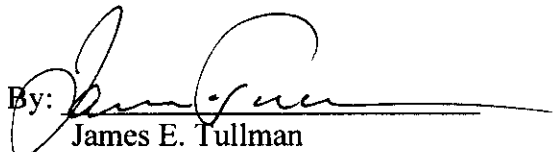
1. I am a member in good standing of the following bars:

- a. USDC, Central District of California
- b. USDC, Northern District of California
- c. USDC, Southern District of California
- d. USDC, Eastern District of New York
- e. USDC, Southern District of New York
- f. USDC, District of Colorado
- g. USDC, Western District of Michigan
- h. U.S. Court of Appeals for the Third Circuit
- i. U.S. Court of Appeals for the Tenth Circuit
- j. U.S. Court of Appeals for the Ninth Circuit.

2. There are no disciplinary proceedings pending against me as a member of the foregoing bars; and

3. I have read and am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WEISS & YOURMAN

By: 
James E. Tullman
551 Fifth Avenue
New York, NY 10176
(212) 682-3025

Dated: September 20, 2004